



RE: Avery Landing Biological Assessment

Fisher, Cameron

to:

Jay\_Martini

08/05/2011 01:33 PM

Cc:

Bryon\_Holt, Earl Liverman, "Hall, Steven G."

Hide Details

From: "Fisher, Cameron" <CFisher@ene.com>

To: <Jay\_Martini@fws.gov>

Cc: <Bryon\_Holt@fws.gov>, Earl Liverman/R10/USEPA/US@EPA, "Hall, Steven G." <SGHall@ene.com>

1 Attachment



EPA\_response\_to\_USFWS(8-5-11).pdf

Hi Jay

The pdf attached provides answers to your questions below.

Please let me know if there is anything else you require to complete your review.

Regards

Cameron

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**From:** Jay\_Martini@fws.gov [[mailto:Jay\\_Martini@fws.gov](mailto:Jay_Martini@fws.gov)]

**Sent:** Thursday, July 21, 2011 11:24 AM

**To:** Fisher, Cameron

**Cc:** Bryon\_Holt@fws.gov; Liverman.Earl@epamail.epa.gov

**Subject:** Avery Landing Biological Assessment

Hi Cameron,

I have reviewed the Biological Assessment for the Avery Landing Site Removal Action and find that it was a very

well written document. However, I have few comments/questions for you regarding certain aspects of the project.

- 1.) Page 2-1 indicates that there are, "drums of investigation derived waste" onsite from a an earlier EPA cleanup. Will these drums and the 5,000 gallon storage tank be removed as part of this project?
- 2.) Page 2-4 states that, "The treated groundwater will be discharged to the St. Joe River and/or allowed to passively infiltrate the soil." What water quality standards will the treated water be held to? It is the Service's position that any contaminates that are added to the watershed represents a potential negative effect that may adversely affect migratory birds, bull trout and/or their forage base. Thus, we strongly recommend that if water does not meet an approved Idaho DEQ and EPA sampling and analysis plan and/or exceeds background river levels of contaminates it should be transported to a certified wastewater treatment plant and not discharged into the St. Joe River or allowed to infiltrate the soil.
- 3.) Page 2-5 states that contaminated riprap will be removed to an on-site geomembrane lined treatment area to be steam cleaned and/or pressure washed. We are again concerned about the water that will be produced as a result of washing the contaminated riprap (see above comment). Since the washing will take place on a lined treatment area, will the water simply be allowed to evaporate off the liner? Please describe what will happen with the waste water after the cleaning of the riprap occurs.
- 4.) Page 2-5 states that a temporary dam-like structure may be constructed on the stream-side of the existing bulkhead to exclude water from the excavation. Please describe what this structure will be made of, how it will be constructed, and its dimensions.
- 5.) Page 2-6 discusses construction schedules. USFWS in-water work windows for this section of the St. Joe River typically run from July 15-September 1st and Nov. 1- February 28. This would include the portions of the project that include removal/replacement of the riprap and construction of the dam-like structure. Typically, if the project cannot be finished within one work window or multiple work window are requested, we ask for an assurance that the conservation measures (Best Management Practices) that are left in place will be sufficiently maintained in a manner that will prevent additional erosion into the St. Joe River.
- 6.) Page 2-7- Please describe what "non-eroding granular material" is.

If you have any questions please give myself or Bryon Holt (509) 893-8014 a call.

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